Finding of No Significant Impact (FONSI) for New Orleans (Michoud) Tower Telecommunication Facility

Introduction

The City of New Orleans proposes to build the New Orleans (Michoud) tower telecommunication facility to enhance interoperable communications among emergency responders throughout the greater New Orleans region. The proposed project includes a new 460' guyed tower as well as a platform, diesel generator, fuel storage tank, and equipment shelter. The parcel proposed for this facility is a currently undeveloped plot of land owned by the City of New Orleans. The State of Louisiana currently operates a statewide analog wireless 800 megahertz (MHz) communications system, which does not allow for the expansion of users due to frequency constraints. As a result of these limitations, the State developed a Project 25 (P25) system throughout Southern Louisiana following Hurricanes Katrina and Rita to expand the infrastructure and support more users. The proposed New Orleans (Michoud) tower project would serve 73 local agencies that use the current statewide system and be part of a statewide P25 infrastructure upgrade to improve emergency communications and simulcast capability in the New Orleans area. The City of New Orleans prepared an Environmental Assessment (EA) of the Proposed New Orleans (Michoud) Communications Tower at 13400 Old Gentilly Blvd, New Orleans, Louisiana, dated June 12, 2009, to analyze the potential environmental impacts associated with the use of the PSIC grant funds.

Scope of the Environmental Assessment (EA)

The proposed New Orleans (Michoud) tower project will apply funds issued by the Public Safety Interoperable Communications (PSIC) Grant Program. The PSIC Grant Program was developed to assist State, local, tribal, and nongovernmental agencies in developing interoperable communications as they leverage the newly available spectrum in the 700 megahertz (MHz) band. As a condition of the PSIC Grant Program, grantees must comply with all relevant Federal legislation, including the National Environmental Policy Act (NEPA) of 1969. Investments receiving PSIC funds can range from installation of new large-scale infrastructure (i.e., towers) to the acquisition of mobile and portable radios. Under the categories outlined in the PSIC Grant Program's Programmatic EA and FONSI (April 2009), the proposed New Orleans (Michoud) tower project is classified as a transmission and receiving site.

The proposed tower location will be used to support public safety operations in the four (4) parish area of St. Bernard, Jefferson, Plaquemines, and Orleans Parishes which comprise Orleans Urban Area Security Initiatives (UASI) Region 1. After Hurricane Katrina, a regional effort was made to build out a common shared communications infrastructure to be utilized by all public safety agencies located in Orleans UASI Region 1. Due to frequency availability and the over 9,000 radio subscribers that operate on the system, a three site Simulcast network was developed to provide 95% coverage within Orleans and the surrounding parishes. Two of the three sites were designed to utilize existing tower locations in Gretna, LA and Metairie, LA. The third simulcast cell was designed for New Orleans East in order to meet the regional coverage requirements. The proposed New Orleans (Michoud) tower project will allow for the following:

- Increased coverage area for emergency responders connected throughout the system
- Facilitate reliable interoperable communications among first responder organizations
- Expand the P25 system throughout the State of Louisiana
- Enhance simulcast coverage throughout the four-parish area

The EA examines the proposed action to develop a new telecommunications facility in the City of New Orleans, Louisiana. The proposed New Orleans (Michoud) tower project would facilitate enhanced security, reliable interoperable communications, and significant increased coverage area for emergency responders through enhanced simulcast ability. The proposed tower project would include the construction of a 460' guyed telecommunications tower to be placed within a fenced 125' x 108'

equipment compound. The EA analyzes existing conditions and environmental consequences of the Alternatives to Implement the Proposed Action with six major resource areas (air quality; biological resources [including terrestrial and aquatic environment, wetlands, threatened and endangered species, and migratory birds]; hazardous materials; socioeconomics [including zoning and land use, visual resources, noise, public services and utilities, and environmental justice]; cultural resources [including historic properties, archaeological resources, and Indian religious sites]; and human health and safety).

Alternatives Considered

Three alternatives, including the No Action Alternative, were analyzed. An additional three alternatives were considered, but not carried forward for further analysis since they did not meet the purpose and need of the proposed action, to effectively improve simulcast coverage within the broadcast area. The three alternatives analyzed in the EA are described below.

Alternative 1 (No Action Alternative). Under the No Action Alternative, the City of New Orleans would continue to use its existing communications system, meaning the lack of a modern system would continue to endanger public safety. This could potentially result in the loss of property and lives during an emergency event. The No Action Alternative would entail no construction activity, and no new facilities or equipment. Ongoing maintenance activities would continue using the current funding sources; however, no new activities would be funded using PSIC grant funds. The No Action Alternative served as the baseline for assessing the impacts of the alternatives.

Alternative 2 (New Orleans (Michoud) Tower). Alternative 2 would implement the New Orleans (Michoud) Tower Telecommunication Facility in its entirety, consisting of a 460' guyed tower within a 125' by 108' compound facility that is currently fenced, a building platform, a stand-alone emergency generator, associated diesel tank, and associated equipment shelter. The proposed Michoud site would be located on city-owned property near the New Orleans Police Academy Firing Range. The tower would tie into the existing local utility system for electrical power as there is power available at the site, and it has an existing access road. Although the entire New Orleans metropolitan area, including the proposed site, is located in a 100-year floodplain, the proposed site was not flooded during Hurricane Katrina and remained accessible throughout the disaster. Accessibility to this site throughout the disaster indicates that the proposed location would likely remain intact and accessible in the event of another storm.

Alternative 3 (WNOL/WGNO Radio Tower). Alternative 3 would use an existing tower owned by local stations WNOL/WGNO and would collocate equipment to enhance functionality and provide simulcast capability. The WNOL/WGNO tower site is located in a wetland, therefore, the addition of a communications shelter to the site would disturb the wetlands and require mitigation. Furthermore, the site held significant flood waters during Hurricane Katrina. Access to site was cut off for weeks, indicating that refueling of the generator or site recovery and maintenance would be impossible in a similar event.

Preferred Alternative

Alternative 2 is recommended for implementation as it best meets the purpose and the need of the City of New Orleans to complete the statewide P25 system infrastructure. This alternative would facilitate greater security, reliable interoperable communications, and significant increased simulcast capability for emergency responders in Orleans UASI Region 1. Neither the No Action Alternative nor Alternative 3 would address the need for the City of New Orleans. Under the No Action Alternative, existing deficiencies in the emergency response communication system would remain and simulcast capability would not be upgraded, posing a greater risk to public safety in the event of another hurricane, natural disaster, or other significant emergency. Under Alternative 3, access to the existing radio site is limited by a narrow entrance road and complicated by the fact that the facility is adjacent to a pond and

associated wetlands. This limited site accessibility would hinder construction of the facility and could result in a significant impact to the nearby wetlands. In addition, the site held significant flood waters during Hurricane Katrina, which left the site inaccessible for several weeks, indicating that it would not be reliably accessible in future natural disasters. Finally, the tower failed a structural load analysis, and would require extensive upgrades to adequately support loads associated with the new communications equipment.

Consultations

Coordination on fish and wildlife issues to meet the Section 7 requirements of the Endangered Species Act (ESA) was accomplished through correspondence with the U.S. Fish and Wildlife Service (USFWS). The USFWS indicated that no Federally listed threatened or endangered species occur within the proposed project area. Therefore, there were no concerns under Section 7 of the ESA and formal consultation was not required. The City of New Orleans completed coordination with the Louisiana Department of Wildlife and Fisheries (DWF) to determine the potential for impacts to State-listed species or habitats of concern. DWF determined that there would be no impacts to State-listed rare, threatened, or endangered species or their habitats from the proposed project. The USFWS and DWF made note of concerns regarding the potential impact of the tower on migratory birds, and recommended guidelines for lighting and marking to minimize bird strike fatalities. Per a memo from the City of New Orleans drafted on July 20, 2009, lighting and marking will be done in such a manner as to comply with the recommendations of USFWS and DWF.

The City of New Orleans accomplished coordination on historic and cultural resources issues through an informal consultation with the Louisiana State Historic Preservation Office (SHPO). The purpose of the informal consultation was to determine whether the construction of the proposed New Orleans (Michoud) tower site may generate any short- or long-term indirect impacts to historic and cultural resources and may be located within the viewshed of any historic and cultural resources. The construction of the proposed New Orleans (Michoud) tower site may indirectly impact the viewshed of architectural resources in the area. However, the SHPO indicated that, although the tower would be in the viewshed of several historic structures, there would be no adverse impact to any of those structures, since the viewshed is already characterized by existing utility lines and communication facilities.

Coordination on impacts to prime and unique farmlands under the Farmland Protection Policy Act (FPPA) was accomplished through informal consultation with the U.S. Department of Agriculture's Natural Resources Conservation Service (NRCS). The NRCS determined that the proposed New Orleans (Michoud) tower site is considered a developed urban area, and would not have any impact to prime and unique farmlands as defined under FPPA, therefore no further action was required.

Findings and Conclusions

The proposed New Orleans (Michoud) tower project is not likely to result in any environmental impacts and does not involve any unusual risks or impacts to sensitive areas. The Proposed Action will require construction of a new transmitting and receiving 460' guyed telecommunications tower with ground disturbance activities (totaling 0.30 acres), and was found to have no significant impacts to any resource impacts examined. The Michoud tower site best meets the purpose and need of the Proposed Action. Coordination with appropriate Federal and State agencies concluded that there were no potential adverse impacts to threatened or endangered species, historic resources, or prime and unique farmlands. Potential impacts to migratory birds will be addressed through recommended mitigation regarding lighting and tower marking.

NTIA Review
NTIA determined that the June 2009 EA of the New Orleans (Michoud) tower site adequately assessed the potential individual and cumulative environmental impacts of the proposed telecommunication facility, including a 460' guyed tower, and that the scope, alternatives considered, and content of the EA are adequate.

This Finding of No Significant Impact (FONSI) is based on the attached EA which has been independently evaluated by the NTIA. The NTIA determined that the EA adequately and accurately addresses the environmental issues and impacts of the proposed project and provides sufficient evidence and analysis for determining that an environmental impact statement is not required.

Based on the best available information and NTIA's independent review, NTIA has decided to adopt the June 2009 EA of the New Orleans (Michoud) tower site (Proposed Communication Tower at 13400 Old Gentilly Blvd, New Orleans, Louisiana). This FONSI has therefore been prepared and is being submitted to document environmental review and evaluation in compliance with the NEPA of 1969. The decision documents for the environmental review of the Proposed Action are attached.

I have considered the information contained in the EA, which is the basis for this FONSI. Based on the information in the EA and this FONSI document, I agree that the Proposed Action as described above, and in the EA, will have no significant impact on the environment.

Laura M. Pettus — 9/15/09

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Date